



SEALED

**Office of the United States Attorney
District of Nevada
501 Las Vegas Boulevard South,
Suite 1100
Las Vegas, Nevada 89101
(702) 388-6336**

NICHOLAS A. TRUTANICH
United States Attorney
District of Nevada
Nevada Bar Number 13644
ALLISON REESE
Nevada Bar Number 13977
Assistant United States Attorney
501 Las Vegas Blvd. South, Suite 1100
Las Vegas, Nevada 89101
Phone: (702) 388-6336
Email: allison.reese@usdoj.gov
Attorneys for the United States of America

FILED
U.S. MAGISTRATE JUDGE
Date: 10-9-2020
Time: 1:42PM

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

IVAN YAIR TOVAR-RODRIGUEZ,

Defendant.

Case No.: 2:20-mj- 900-VCF

APPLICATION TO SEAL

COMES NOW the United States of America, by and through Nicholas A. Trutanich, United States Attorney, and Allison Reese, Assistant United States Attorney, respectfully moves this Honorable Court for an Order sealing the Complaint, this Application and the Court's Sealing Order, in the above-captioned matter, until such time as this Honorable Court, or another Court of competent jurisdiction, shall order otherwise.

In this case, an order sealing the Complaint would be appropriate because the attached Complaint relates to an ongoing criminal investigation into violations of 21 United States Code, Sections 846, 841(a)(1) and (b)(1)(A)(viii); that is neither public nor known to all of the targets of the investigation, and its disclosure may alert the targets to the ongoing investigation. Accordingly, there is reason to believe that the disclosure of the information contained within the Complaint will

1 jeopardize the investigation, including by giving additional targets an opportunity to flee or continue
2 flight from prosecution, destroy or tamper with evidence, change patterns of behavior, or notify
3 confederates.

4 The Government further submits that it is necessary for the Complaint to be sealed in light of
5 the fact that the Government anticipates filing other indictments, including controlled substance and
6 firearms charges, related to the underlying investigation with the goal of taking all defendants into
7 custody at one time. Accordingly, there is reason to believe that notification of the existence of
8 complaint will seriously jeopardize the investigation, as noted previously, and would likely place law
9 enforcement at higher risk of confrontation when securing the arrest of the targets.

10 DATED: October 9, 2020.

11 Respectfully submitted,
12 NICHOLAS A. TRUTANICH
United States Attorney

13 *Allison Reese*

14 ALLISON REESE
15 Assistant United States Attorney
16
17
18
19
20
21
22
23
24

FILED

U.S. MAGISTRATE JUDGE

Date: 10-9-2020

Time: 1:43PM

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

IVAN YAIR TOVAR-RODRIGUEZ,

Defendant.

Case No. 2:20-MJ-900-VCF

ORDER TO SEAL

Based on the pending Application of the Government, and good cause appearing therefor,
IT IS HEREBY ORDERED that the Complaint, the Government's Application and this Court's
Sealing Order, in the above-captioned matter shall be sealed until further Order of the Court.

DATED this 9th day of October, 2020.


HONORABLE CAM FERENBACH
UNITED STATES MAGISTRATE JUDGE